City of Falls Church

Meeting Date:	Title: (TR23-21) RESOLUTION TO		Agenda No.:			
07-17-23	ADOPT THE GOVER		RNMENT		10(b)(1)	
	OPERA'	OPERATIONS ENERGY ACTION				
	PLAN FOR THE CITY OF FALLS					
	CHURC	H				
Proposed Motion: MOVE to adopt (TR23-21).						
Originating Dept. Head: Lead Staff:			Disposition by Council: Motion			
Cindy L. Mester	Andy Young		5	by M	by Mr. Snyder, seconded by	
703-248-5042	703-248-5297		7	Ms. Lian, to adopt (TR23-21)		
CLM 07-12-2023	2023 ANY 07-12-23		PASSED 7-0. (Res. 2023-22)			
City Manager:	City Atto	orney:	CFO:		City Clerk:	
Wyatt Shields	Sally Gil	lette	Kiran Bawa		Celeste Heath	
703.248.5004	703.248.	5010	703.248.5092		703.248.5014	
FWS 7-13-24	SG 07-13-23		KB 7-13-2023		CH 07-13-23	

REQUEST: Council is requested adopt the Government Operations Energy Action Plan. This plan provides a set of strategies and actions that can help the City achieve an 83% reduction in greenhouse gas emissions compared to a 2022 baseline. The Government Operations Energy Plan is a guiding policy document with implementation actions to be approved through follow-up Council actions as it pertains to contracts and expenditures. The Plan has been developed with extensive input from staff and the Environmental Sustainability Council (ESC) and is now before the City Council for final consideration.

RECOMMENDATION: Staff recommends adoption of (TR23-21).

UPDATES SINCE JULY 10, 2023 WORK SESSION: Council reviewed the draft Plan during their July 10, 2023 work session, and ESC members provided several comments as a follow-up. Since then, staff has revised the draft Plan in response to the comments provided. The following tables summarize the changes made.

CITY COUNCIL WORK SESSION COMMENT MATRIX

Comment	Response
Goals Consider setting an ambitious goal such as "Carbon Neutral by 2030" that creates excitement is easier to understand.	Language added to page 2: In recognition of the increasing impacts of climate change, the need to accelerate the rate of GHG reductions, peer locality carbon neutrality goals, and the scale of GHG reductions that the City could achieve by 2030 as laid out in this Plan, the City will also look for additional opportunities to advance its efforts and achieve an aspirational goal of carbon neutrality by 2035.
Execution	

Pleased to see actionable recommendations with fiscal projections we can use for planning purposes. It will be important to provide support to ensure follow-through.

Acknowledged.

It is important that this plan ties back to the City Council work plan.

Staff will tie future staff reports to this plan to ensure follow through on the goals and strategies contained in the plan.

There are a lot of activities identified for execution in FY 2024. Do we have resource gaps that need to be addressed in the short term?

Staff has initiated discussions on prioritization and resourcing of the FY 2024 activities identified in the plan.

Due to the size of their building portfolio, Falls Church City Public Schools (FCCPS) is a key contributor to this plan's outcomes. Their leadership and actions will be critical for this plan's success. Acknowledged. Staff will continue to partner with FCCPS Operations for school-related actions that support the plan.

Excited to see the emphasis on individual decisions by staff as a key element of the plan.

Acknowledged.

Costs

It is important that we continue to refine cost estimates to be able to make decisions and move actions forward.

Acknowledged. Individual projects and programs will be submitted for consideration as part of the normal City Council decision-making processes.

There are concerns about approving expenditures as outlined in the report.

There will be individual decision points presented to Council through the City's budgeting processes to execute elements of this plan. The cost estimates provided in this plan are only for planning purposes and identifying potential opportunities.

It is import to focus on the maximum emission reductions at the best cost.

Acknowledged. Future investments must consider emissions reductions, mission impact, and a cost-benefit analysis as part of the decision-making process.

ENVIRONMENTAL SUSTAINABILITY COUNCIL COMMENT MATRIX

Comment	Response
Offsite Renewable Electricity	
The report should more clearly differentiate between Renewable Energy Credits (RECs) and a Virtual Power Purchase Agreement (VPPA) due to the stronger environmental attributes of the latter, which will add renewable energy sources to the electric grid. RECs should only be considered a short-term solution.	The report has been updated to more clearly differentiate between the two and underline the importance of pursuing a VPPA as the City's mediumterm offsite renewable electricity solution. Language added to page 24: VPPAs also provide additionality, meaning they are directly adding new renewable resources rather than subsidizing existing resources, as RECs typically do.
Virginia Clean Economy Act and RECs	
It is unclear why the City would buy RECs to cover all its Dominion electricity purchases when roughly half of the local electricity grid is expected to come from renewable sources by 2030. The report seems to have us buying twice as many RECs as we will need.	The requirement to purchase RECs as a representation of renewable energy is driven by greenhouse gas accounting rules. As an end-user, the City cannot claim the environmental attribute of purchased grid electricit unless it purchases the associated RECs.
MWCOG 2005 Baseline	
The plan benchmarks the City's government operations emissions against a 2022 baseline rather than the 2005 baseline used for MWCOG's regional goal. Can we use a 2005 baseline to be consistent with MWCOG, even if it needs to be estimated?	Unfortunately, there is insufficient data to estimate the City's energy use and emissions back to 2005. The good of a 50% reduction from the 2022 baseline can be viewed as a more ambitious target due to the efficiency gains already realized by the City through its recent facility projects, as well as the cleaner electricity grid that exists today.

BACKGROUND: The City of Falls Church's environmental goals are codified in the "Environmental Sustainability, Resilience and Natural Resources" Chapter of the City's Comprehensive Plan, which was unanimously adopted by City Council on February 10, 2020 following an extensive public engagement process. In 2017, Council resolved to adopt regional goals established by Metropolitan Washington Council of Governments (COG) to reduce emissions of greenhouse gases (GHGs) 20% below 2005 levels by 2020, and 80% below 2005 levels by 2050. In 2020, Council supported the adoption of a regional interim goal by COG to achieve a 50% reduction in regional GHG emissions below 2005 levels by 2030.

- 34 To define a path forward, Council approved two Energy Action Plans as part of its 2023-2024
- 35 Work Plan – one focused on the community and another on government operations. Funding was
- allocated in the FY2022 budget (\$125,000) for the Community Energy Action Plan (CEAP) and 36
- 37 in the FY2023 budget (\$50,000) for the Government Operations Energy Action Plan (GOEAP).
- 38 Consultant support for both plans is being provided by ICF Incorporated, LLC (ICF) through a
- 39 contract with COG.

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- 41 The purpose of the GOEAP is twofold: to contribute to meeting the City's long-range emission 42 reduction targets, and to serve as a positive example to residents and businesses on what 43 emission reductions are possible while continuing to meet the mission of the City and being
- 44 fiscally responsible. The intended outcomes of the planning effort are to establish a goal
- 45 framework with specific targets for City operations to meet, and provide a list of strategies to 46
 - help accomplish those goals, each with suggested steps for implementation.

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The GOEAP provides strategies and proposed actions applicable to both the general government and schools (collectively referred to as City). The plan was collaboratively developed over the last four months with staff from a wide range of City government departments, with more extensive engagement by team members from the Department of Public Works (DPW) and Falls Church City Public Schools (FCCPS) Operations.

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2022 EMISSIONS

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58 59 Total greenhouse gas emissions in 2022 from Government Operations were estimated to be the equivalent of 3,760 metric tons of CO₂ (MTCO₂e), which represents 3% of the community-level greenhouse gas emissions for the City of Falls Church. Electricity and natural gas use in the City's buildings contributed to 83% of that total, with the rest of coming from the use of gasoline and diesel in the City's vehicle fleet.

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The year 2022 was chosen as the City's base year for emissions because full energy and activity data were available and economic activity was deemed to have normalized from the effects of COVID-19.

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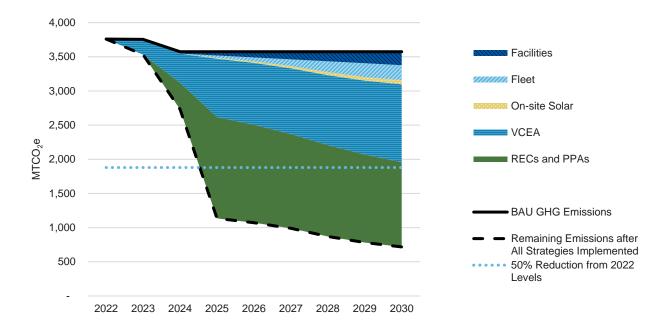
2030 EMMISSIONS REDUCTION POTENTIAL

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If the City successfully implements every strategy, it can expect to see GHG reductions of about 83% from 2022 levels by 2030. This is equivalent to about 3,100 MTCO₂e, or 690 cars off the road. The emissions remaining in 2030 are projected to come from consumption of natural gas in City facilities, and consumption of gasoline and diesel in the City's fleet.



Contributors to the City Government Operations emission reductions in the above chart include the following:

- Facilities: Energy efficiency retrofits and building electrification
- **Fleet:** Purchasing hybrid and battery electric vehicles (BEVs) as existing vehicles are replaced
- Onsite Solar: Installing rooftop solar on City facilities
- VCEA: Cleaner electricity sourced from the grid as a result of the Virginia Clean Economy Act (VCEA)
- **RECs and PPAs:** Purchasing Renewable Energy Credits (RECs) and Power Purchase Agreements (PPAs) to offset remaining electricity emissions

STRATEGY FRAMEWORK

The framework for the City to achieve its GHG emission reduction goals is organized into eight different strategies that will guide implementation of supporting actions to reduce energy use and strategically electrify buildings, procure renewable electricity, and implement a sustainable vehicle procurement plan. Each of the eight strategies includes a lead implementer, stakeholders, potential GHG reduction estimates, rough order of magnitude (ROM) costs, and key metrics to follow.

Strategy 1: Collaboration, Partnerships, and Plan Management

This Plan will be most effectively implemented with improved coordination between the staff who focus on energy issues and other professionals who make decisions affecting energy use in the course of their daily duties. The primary focus of this Strategy is establishing a permanent interdepartmental working group across City staff to meet quarterly to discuss implementation of the Energy Action Plan. Maintaining an active workgroup will help institutionalize energy management and underscore the City's commitment to continuous improvement. Partnerships with local businesses, regional jurisdictions, COG, and local utilities will all be essential.

Strategy 2: Employee Education and Training

Educating and training City staff on energy management is a key element to integrating energy efficient strategies into routine City operations, introducing new technologies, and bolstering energy efficiency and conservation in pursuance of City goals. As a first step, the City will develop and implement staff education campaigns around the GOEAP strategies and building operations. In 2024 the City will also identify what training and skills will be required to implement the fleet and facilities strategies, which will then inform the development of a multi-year plan to train fleet and facilities staff on new equipment, maintenance, and building control systems operations and settings, which will be implemented in FY2025 and beyond.

Strategy 3: Metrics, Tracking, and Reporting

The foundation of energy management is gathering and organizing accessible, verifiable data that can be used to understand energy consumption and efficiency opportunities. With high quality, organized data, the City can identify energy needs, adjust energy demand, and implement impactful projects with metrics-based goals that can be tracked. Readily available, accurate data will also enable the City to easily share goal status updates across departments and to the community to inform others and build trust with the government.

To efficiently collect and evaluate data, the City must have access to an energy management software platform, as well as an upgraded fleet management software platform, both of which will simplify reporting, provide more accurate data on energy usage, and reduce administrative burden for departmental cost allocation and maintenance tracking. The Energy Management software platform was funded in the City's FY2024 budget.

Strategy 4: Clean Electricity Supply

Strategy 4 aims to supply 100% of electricity usage with renewable resources by 2025 and identifies three methods for renewable resource procurement and a phased approach to each option. This strategy builds on the City's existing efforts, which have offset GHG emissions from electricity use for 25% of general government operations since FY2013.

This first is the expanded purchase of RECs, which are credits equal to one megawatt-hour of generation from a renewable energy facility. To date, the City has not prioritized purchasing specific types of RECs that are created locally or from specific resources. Going forward, any REC purchase decisions will balance cost with a preference for in-state RECs and/or those from wind or solar resources.

In addition to purchasing RECs, the City is prioritizing developing onsite solar. Over the next year, the City will work to complete feasibility and potential studies to host rooftop solar on its buildings. Staff will identify which buildings are able to host solar, how much solar, and at what cost – including funding opportunities, before setting an implementation timeline and determining project budgetary needs. The City's plan will incorporate lessons learned from its first project, a rooftop solar facility at the high school, which is ongoing and expected to be completed in late 2023.

Finally, the City will pursue a virtual power purchase agreement (VPPA) with a specific wind or solar asset, preferably in the state of Virginia. A VPPA is viewed as a better medium-term

solution for the City's offsite renewable electricity over REC purchases as it represents additional renewable capacity to the electric grid. To accomplish this, the City will plan to partner with other Virginia jurisdictions in FY2024 to engage consultant services to support the VPPA process, which includes identifying potential offtake partners and providing contract and

negotiations support, with a goal of having a VPPA in place by 2028.

The latter two options can offer more direct benefits to the City than REC purchases. For example, onsite solar will reduce electricity costs and a PPA can help provide some electricity price certainty. Onsite solar can also enhance building resiliency during electric power outages or be paired with charging stations to increase reliability for the fleet's electric vehicles.

Strategy 5: Energy Efficiency in Buildings

Strategy 5 aims to increase building energy efficiency by focusing on upgrading older equipment and building control systems and ensuring facilities are operating at high performance levels. The actions in this strategy will not only reduce energy usage, lowering energy costs and emissions, but will also improve building operations and facilitate system maintenance by City staff, all of which should improve the comfort levels of building occupants.

This strategy will have the City adopt an Energy Efficiency Policy in 2024 to ensure that all operational improvements for facilities prioritize energy efficiency, including new lighting, appliances, and HVAC equipment. In order to identify opportunities for upgrades and maximize building efficiency, the City must undertake building energy audits. This strategy sets a goal of auditing each building every 5 years, or an average of completing 2 building audits each year. City facilities staff will then review the recommended changes from the energy audit and use them to inform facility maintenance and upgrade plans.

The City has already installed a wide range of different control systems and platforms throughout its buildings. With building control systems, facilities staff can set occupancy hours, economizer cycles and other energy efficiency focused control sequences in all facilities to fit with operations. The City currently requires multiple contracts with different vendors to help manage its existing control systems, which are not standardized or set up for remote access, making it difficult for facilities staff to fully control building operations. This strategy includes steps to complete an inventory of current control systems; develop standardized requirements for them going forward so as not to have multiple different systems; and, ultimately, bring all building control systems in line with those standardized specifications.

Strategy 6: Electrification of Buildings

Strategy 6 aims to complement Strategy 5 by electrifying areas of gas use where feasible from both a cost and building performance perspective. Building electrification paired with clean electricity (Strategy 4) remains one of the most direct pathways toward a low carbon building footprint. There can be challenges with some of the newer technologies involved. To help minimize operational issues, the City should ensure the facilities team is involved in all design phases of any building renovations or new buildings to find solutions that enable electrification and minimize operations and maintenance concerns.

In 2024, the City should complete an inventory of all equipment currently using natural gas and compile a list of possible electric or zero-carbon replacement options. In 2025, the City can then develop a gas equipment replacement plan. The facilities team will have direct input through a collaborative process on whether a cost-effective electric replacement option is available that will work well for the City's mission at that location.

Strategy 7: Fleet Optimization

Strategy 7 aims to optimize the fleet to right-size the number of vehicles in the General Government and School fleet to meet the needs of City staff and departmental missions. Throughout 2023, the City will review its least-used vehicles for right-sizing opportunities and identify opportunities for shared uses and/or combined platforms for supporting niche requirements. The City is already moving forward with a shared vehicle pool, which should help optimize vehicle usage across City staff.

Outcomes of this critical assessment will put the City on a path to purposefully integrate electric vehicles to the fleet by identifying and prioritizing which vehicles can be replaced by an electric version based on what routes and needs they can best serve. This ties into the sustainable vehicle procurement planning in Strategy 8, which will create a vehicle procurement plan with identified areas for electric vehicle adoption.

Strategy 8: Centralized and Sustainable Vehicle Procurement

Strategy 8 aims to overhaul the City's vehicle procurement process through centralization and standardization. Not only will the City develop a centralized procurement planning process, but it will establish clear guidelines for how many vehicles in various categories will be replaced each year, optimal vehicle lifetimes, and what types of vehicles may be considered for purchase.

Implementation will be driven by a fleet-focused working group. This work stream will be conducted simultaneously with the activities under Strategy 7 and will result in a detailed vehicle procurement plan for the City through 2030, including estimated budget requests that departments will need to plan for, funding opportunities, and total cost of ownership estimates for new vehicle options. The working group will complete both the BEV and hybrid procurement planning and charging infrastructure needs assessment in 2024.

The working group sustainable fleet procurement guidelines will start from initial assumptions used in this report:

- General Government: where available and feasible, electric and hybrid options will be purchased starting in FY2024; starting in FY2027, all-electric models will be selected as top priority.
- Schools: where available and feasible, electric and hybrid options will be purchased for general use vehicles starting in FY2024; starting in FY2027, all-electric models will be selected as top priority. All new school buses should be electric if feasible with identified funding. In later years, the total cost of ownership of electric school buses is expected to reach parity with that of diesel buses.

Vehicle purchases will be timed on the following lifecycles:

- Patrol vehicle 6 years
- General use vehicle 10 years
- Specialty use vehicle 12 years
- School bus 12 years

Based on the current size of the City's vehicle fleet and those target lifecycles, the City should plan to make the following replacements annually:

- Government: 2 patrol vehicles, 5 general use vehicles, 2 specialty use vehicles
- Schools: 2 general use vehicles, 2 school buses

NEXT STEPS: The City faces a pressing timeline to achieve significant emission reductions by the end of the decade. To ensure successful implementation of the strategies outlined in the GOEAP, it is crucial that some implementation steps begin in the FY2024 to lay the groundwork for future actions. To effectively accomplish these first steps there needs to be staff support, organizational and process change, as well as the prioritization of staff training and new hires where needs are identified. It is vital for the City Council to prioritize and allocate resources to these areas, recognizing that the effectiveness of implementation hinges on the availability of staff time and dedicated resources. FY2024 acts as a pivotal year for establishing the necessary groundwork for the successful execution of the GOEAP and achieving emission reductions by 2030.

To effectively move forward with the wide range of activities identified in this report, many of which need to start in FY2024, this plan may require three additional FTEs to provide staff bandwidth for overall program management of the activities outlined in this report, as well as specific focus on more in-depth management of HVAC/control systems and fleet planning, procurement, and support. Staff resources needed to execute future Capital Improvement Program (CIP) projects (rooftop solar, etc.) will be identified separately as part of future CIP submissions to City Council.

FISCAL IMPACT: The following are starting ROM estimates of the total cost of opportunities for energy efficiency retrofits, electrification, and rooftop solar additions in each of the City's 10 facilities. The costs were determined by applying a dollar per square footage estimate of what it could cost to improve overall energy efficiency of the facility, electrify facility heating or cooling, and install rooftop solar where potential opportunities were identified:

- Energy efficiency: \$1,400,000 \$2,000,000
- 278 Electrification: \$1,600,000 279 Rooftop Solar: \$600,000

The cost for RECs to cover 100% of general government electricity use has been included in the FY2024 budget for \$16,000, and the additional cost for RECs to cover the school's electricity use in FY2025 is estimated to be \$53,000.

05/16/2023

05/22/2023

06/25/2023

285 Annual vehicle investment requirements to support the sustainable fleet procurement guidelines 286 outlined in Strategy 8 are approximately \$500,000 each for general government and schools. 287 These budgetary amounts represent a 90% increase for general government and 290% increase 288 for schools from recent historical expenditures on vehicle purchases, and are driven primarily by 289 meeting the replacement lifecycles listed for the different vehicle categories above. The added 290 cost for purchasing hybrid and electric vehicles is a smaller contributor, with the exception of 291 electric school buses, which will be reliant on grant funding over the next several years before 292 the total cost of ownership for electric school buses reach parity with that of diesel buses.

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Electricity usage, and its associated costs, is projected to to increase as equipment and vehicles are electrified. Those increases in usage will be offset by energy efficiency and onsite solar generation as those projects are completed.

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TIMING: An update was provided on the scope, schedule, and community engagement strategy for both plans at the Council's February 6, 2023 work session, and there was a progress update on the GOEAP at the June 5, 2023 work session.

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Development of the GOEAP was completed through the following key milestones:

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External Engagement	
Environmental Sustainability Council Meeting	03/16/2023
Environmental Sustainability Council Meeting	05/18/2023
School Board Meeting	05/23/2023
City Council Work Session	06/05/2023
Environmental Sustainability Council Meeting	06/15/2023
City Council Work Session on Final Report	07/10/2023
City Council Meeting for Adoption of Resolution	07/17/2023
Internal Engagement	
General Government Employee Town Hall	03/13/2023
Facilities Focus Group	04/10/2023
Fleet Focus Group	04/14/2023
School Buildings Deep Dive	04/17/2023
General Government Buildings Deep Dive	04/20/2023
Facilities Goals and Solutions	04/24/2023
Fleet Goals and Solutions	04/28/2023
School COO Update	05/10/2023
General Government Leaders Update	05/12/2023
General Government Directors Update	05/15/2023
	Environmental Sustainability Council Meeting Environmental Sustainability Council Meeting School Board Meeting City Council Work Session Environmental Sustainability Council Meeting City Council Work Session on Final Report City Council Meeting for Adoption of Resolution Internal Engagement General Government Employee Town Hall Facilities Focus Group Fleet Focus Group School Buildings Deep Dive General Government Buildings Deep Dive Facilities Goals and Solutions Fleet Goals and Solutions School COO Update General Government Leaders Update

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ATTACHMENTS:

Schools Operations Update

Schools Leadership Update

Leadership Review of Final Report

1. 2023 Government Operations Energy Action Plan

331		(TR23-21)
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333		RESOLUTION TO ADOPT THE GOVERNMENT OPERATIONS ENERGY
334		ACTION PLAN FOR THE CITY OF FALLS CHURCH
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336	WHEREAS,	the City of Falls Church is one of twenty-two local governments who are members
337		of the Metropolitan Washington Council of Governments (MWCOG), and who
338		collaboratively adopted in January, 2010, a comprehensive vision known as
339		Region Forward; and
340		
341	WHEREAS,	Region Forward set out a regional goal to reduce greenhouse gas emissions 20
342		percent below 2005 levels by 2020, and 80 percent below 2005 levels by 2050; and
343	MHEDEAG	
344	WHEREAS,	the City adopted the regional greenhouse gas (GHG) emissions reduction goals
345		developed by MWCOG, as its own goals, applicable to city government, its
346		residents and businesses in March 2017; and
347	WHEDEAC	in 2020 MWCOC adopted a regional interim goal to achieve an 500/ reduction in
348 349	WHEKEAS,	in 2020, MWCOG adopted a regional interim goal to achieve an 50% reduction in
		regional GHG emissions by 2030 as part of its <i>Metropolitan Washington 2030</i>
350 351		Climate and Energy Action Plan; and
352	WHEDEAC	in February 2020, the City updated Chapter 5, "Environment for Everyone:
352 353	WIEKEAS,	Environmental Sustainability, Resilience, and Natural Resources" of the City's
354		Comprehensive Plan, which addresses how environmental goals can be incorporated
355		into the City's planning for the future, including the reduction of GHG emissions; and
356		into the City's planning for the fature, including the reduction of GITG emissions, and
357	WHEREAS.	the City Council included in its FY 2023 - FY 2024 work plan the adoption of a
358	,,	City Government Energy Plan to lay out the practical steps needed by general
359		government and schools to achieve the City's adopted greenhouse gas emission
360		reduction targets; and
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362	WHEREAS,	the development of this plan has identified numerous opportunities for partnership
363	ŕ	between general government and schools to efficiently and effectively collaborate
364		on reducing emissions; and
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366	WHEREAS,	City actions to increase energy efficiency and reduce GHG emissions can provide
367		multiple benefits such as decreasing air pollution, improving resiliency, and saving
368		money for City government, schools, residents and businesses, and
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370	WHEREAS,	City actions can set an example for residents and businesses on what emission
371		reductions are possible while continuing to meet the mission of the City and being
372		fiscally responsible; and
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374	WHEREAS,	the actions proposed in this plan will contribute to the Falls Church community
375		meeting its interim goal of a 50% reduction in emissions by 2030; and
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377 WHEREAS, this is a guiding policy document with implementation actions to be approved 378 through follow-up Council actions as it pertains to contracts and expenditures; 379 380 NOW THEREFORE, BE IT RESOLVED, that the City of Falls Church, Virginia, will 381 adopt the Government Operations Energy Action Plan, as its roadmap to for reducing energy use 382 and emissions in its buildings and vehicle fleet; and 383 384 BE IT FURTHER RESOLVED that the City of Falls Church will take actions, consistent 385 with resources deemed appropriate and assigned by City Council, to complete the strategies and 386 actions outlined in the Government Operations Energy Action Plan; and 387 388 BE IT FURTHER RESOLVED that the City of Falls Church will seek opportunities to 389 work between the general government and schools, as well as neighboring jurisdictions, to 390 accomplish these emission reduction goals; and 391 392 BE IT FURTHER RESOLVED that the City Council authorizes the City Manager and/or 393 his designee(s) to sign the Government Operations Energy Action Plan and any related 394 documents substantially of the form as currently presented, with such non-substantive changes as 395 may be acceptable to the City Manager and the City Attorney. 396 397 Reading: 398 Adoption: 399 (TR23-21) 400